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JUL-17-2008 18:41 From: US ATTORNEY

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FAX NO.

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11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
15

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 JUAN HERRERA-SANTOS,

20 Defendant.

CR No. 07-764-SI

DECLARATION OF DEAN RIES IN  
SUPPORT OF UNITED STATES'  
SENTENCING MEMORANDUM

Hearing Date: July 25, 2008  
Time: 11:00 a.m.  
Judge: The Honorable Susan Illston

21  
22 I, Dean Ries, declare and state as follows:

- 23 1. I make this declaration based on my training and experience. This declaration  
24 does not contain all facts that I know about the defendant, the Surenos, or gangs  
25 generally.
- 26 2. I am a Sergeant in the San Francisco Police Department ("SFPD"). I have been in  
27 the SFPD since 1995. I was assigned to the SFPD's Tenderloin Task Force from  
28 1996 to 2006. During that time, I investigated crimes committed in San

KING DECL. SUPP. UNITED STATES' SENT. MEM.  
CR 07-764 SI

1 Francisco's Tenderloin neighborhood. I am now assigned to the SFPD's Gang  
2 Task Force. My current responsibilities include investigating crimes committed in  
3 San Francisco by members of gangs, including the Surenos. Because of my  
4 experience as a member of the Tenderloin Task Force and the Gang Task Force, I  
5 am familiar with many gang members who operate or live in the Tenderloin. I  
6 have received law enforcement training about many aspects of gangs and gang  
7 member behavior.

8 3. I have been familiar with Juan Herrera-Santos, a/k/a Juan Rivera, the defendant in  
9 the above-captioned case, for several years. Based on my experience, I know that  
10 he is a member of the Surenos, a street gang operating throughout California, and  
11 has been a member for many years. Specifically, Herrera-Santos is a member of  
12 the 11th Street sect of the Surenos. Herrera-Santos has tattoos indicating that he  
13 is a Sureno and, specifically, an 11th Street Sureno. The 11th Street sect of the  
14 Surenos claims parts of the Tenderloin as its "turf." Their turf includes the area  
15 around the intersection of O'Farrell Street and Larkin Street, where Herrera-  
16 Santos was arrested selling drugs on September 16, 2007.

17 4. Based on my experience, I know that the Surenos show membership in their gang  
18 by wearing the color blue. I also know that the Surenos often wear a blue belt  
19 dangling from their pants to show their membership.

20 5. The Surenos, like other gangs, guard their drug dealing turf. Although the  
21 Surenos let some people who are not members of their gang sell drugs on their  
22 turf in exchange for a portion of the profits, the Surenos would not let a person  
23 who dropped out of their gang sell drugs on their turf, or even enter their turf.

24 6. I know that Herrera-Santos has claimed that he has dropped out of the Surenos. If  
25 this were true, the other Surenos would view him as a traitor. As stated above,  
26 Sureno members would not let him sell drugs on their turf, or even enter it. Based  
27 on my training and experience, I believe that they would probably attack him to  
28 force him out of their turf.

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- 1 7. If Herrera-Santos were really a Sureno dropout, he would know that members of  
2 the gang would probably attack him if he tried to sell drugs on their turf or even  
3 enter it. For this reason, I have never heard of a Sureno dropout selling drugs in  
4 Sureno drug turf.
- 5 8. San Francisco County Jail has a separate housing area for gang dropouts. This  
6 separate housing ensures that inmates who are dropouts are not housed with active  
7 gang members because the active gang members would assault them. If Herrera-  
8 Santos had been a dropout, he could have claimed dropout status and would have  
9 been segregated from active gang members.
- 10 9. I know that Herrera-Santos claimed that he was a Sureno when he was  
11 incarcerated in San Francisco County Jail in September 2007 before he was turned  
12 over to federal authorities. At that time, he was housed with other Surenos.  
13

14 I declare that the foregoing is true and correct under penalty of perjury.  
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16 DATED: 7-17-2007

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18 DEAN RIES  
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